

# **EXHIBIT 7**

Highly Confidential - Gerald Ambrose

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF MICHIGAN  
3 SOUTHERN DIVISION  
4

5 -----) Civil Action No.:  
6 IN RE: FLINT WATER CASES ) 5:16-cv-10444-JEL-MKM  
7 ) (consolidated)  
8 )  
9 ) Hon. Judith E. Levy  
10 -----) Mag. Mona K. Majzoub  
11

12 HIGHLY CONFIDENTIAL  
13 VIDEOTAPED DEPOSITION OF GERALD AMBROSE  
14

15 Wednesday, June 10, 2020

16 Volume 1  
17

18 Remote oral deposition of GERALD AMBROSE,  
19 conducted at the location of the witness in Lansing,  
20 Michigan, commencing at approximately 9:07 a.m., on  
21 the above date, before JULIANA F. ZAJICEK, a  
22 Registered Professional Reporter, Certified Shorthand  
23 Reporter, Certified Realtime Reporter and Notary  
24 Public.

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1 A. Yes.

2 Q. I want to move now and -- and talk about  
3 the next exhibit. Move to the next exhibit, please.  
4 And I believe this is going to be 40.

5 (WHEREUPON, a certain document was  
6 marked Gerald Ambrose Deposition  
7 Exhibit No. 40, for identification,  
8 as of 06/10/2020.)

9 BY MR. ERICKSON:

10 Q. Exhibit 40 is an e-mail chain between  
11 Mr. Ambrose and Mr. Mike Brown. This was previously  
12 marked as Exhibit No. 11 to the Kurtz deposition, and,  
13 again, it is 40 here today.

14 Mr. Ambrose, I'm going to be focused on  
15 your e-mail to Mr. Brown that's there in the middle of  
16 the page. Why don't you take a -- a couple of minutes  
17 to look it over and let me know when you are ready.

18 A. I've gotten to the bottom of the page.

19 Q. My questions are going to be focused on  
20 this page. We'll show you the next page, just show  
21 you --

22 MR. ERICKSON: Why don't you scroll down to the  
23 end of it briefly, Sarah.

24 Oh, in fact, let -- leave it there for a

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1 recollection about Mr. Kurtz making similar statements  
2 at any other time?

3 MR. STRITMATTER: Objection; foundation.  
4 Stritmatter.

5 BY THE WITNESS:

6 A. I don't have a recollection of Mr. Kurtz  
7 saying that at other times.

8 BY MR. ERICKSON:

9 Q. Well, let me -- let's turn to the next  
10 exhibit.

11 (WHEREUPON, a certain document was  
12 marked Gerald Ambrose Deposition  
13 Exhibit No. 42, for identification,  
14 as of 06/10/2020.)

15 BY MR. ERICKSON:

16 Q. Exhibit -- this is Ex -- previously marked  
17 Exhibit 9 at the Kurtz deposition. It will be  
18 Exhibit 42 today. This is a letter -- a draft letter  
19 from Mr. Kurtz to Kevin Orr dated June 7, 2013. And I  
20 want to draw your -- I -- I don't have any reason to  
21 believe you've seen this before.

22 Do you have any recollection of seeing it?

23 A. No.

24 Q. I want to direct your attention to the

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1 highlighted sentence.

2 "Upon termination of service, Flint will  
3 begin utilizing Flint River water for consumption."

4 Do you see that?

5 A. I do.

6 Q. Do you believe that Mr. Kurtz had made  
7 that decision by the date of this letter or -- or the  
8 date of this draft letter?

9 A. This is Mr. Kurtz' letter, I would think  
10 he would be factual.

11 Q. Okay. I don't have any more questions  
12 about it.

13 I may have asked you this question  
14 already, and if I have, I apologize, but I want to be  
15 certain.

16 Do you recall attending any meetings  
17 between the City and LAN and City staff from the DPW  
18 in the spring of 2013?

19 MR. KIM: Objection as to form. Kim.

20 BY THE WITNESS:

21 A. Well, there were a number of meetings that  
22 were held as part of the process. I may have  
23 participated in some but not in all and certainly not  
24 at a level of discussing the technical aspects of